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May 4, 2022

**BY ELECTRONIC FILING (ECF)**

Hon. Ann Marie Donio, U.S.M.J.  
United States District Court for the District of New Jersey  
Mitchell H. Cohen U.S. Courthouse, Room 2010  
1 John F. Gerry Plaza, 4<sup>th</sup> & Cooper Streets  
Camden, New Jersey 08101

Re: Audra Capps, et al. v. Joseph Dixon, et al.  
Case No.: 1:19-cv-12002-RMB-AMD

Tanika Joyce, et al v. Joseph Dixon, et al.  
Case No.: 1:20-cv-01118- RMB-AMD

Barry Cottman v. Joseph Dixon, et al.  
Case No.: 1:19-cv-14122-NLH-AMD

Dear Judge Donio:

As the Court will recall, I represent the Plaintiffs in the Capps and Joyce cases. Pursuant to the Court's April 20, 2022 Scheduling Order, the parties were to advise whether they intend to pursue private mediation or whether they seek a settlement conference with the Court.

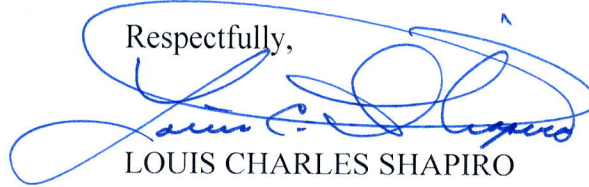
As mentioned during the last telephone conference with Your Honor, I advised that Plaintiffs would be willing to participate in mediation. I would also add that we would be willing to participate in a settlement conference with the Court. However, if these cases are to be settled, the Defendants would need to be serious about pursuing a resolution, the cases would need to be settled globally, and all at the same time, rather than in piecemeal fashion.

At the last telephone conference, Defendants' position on participating in mediation was

unclear. Since that time, and as of this writing, Defendants have not contacted me by any means on these subjects. As such, unless I hear something dramatic to the contrary, it appears that I have my answer.

I thank the Court for its time and attention to this case.

Respectfully,

A handwritten signature in blue ink, appearing to read "Louis Charles Shapiro", is written over the word "Respectfully,". The signature is fluid and cursive, with a large loop at the end.

LOUIS CHARLES SHAPIRO

cc: A. Michael Barker, Esquire (By ECF)  
Thomas B. Reynolds, Esquire (By ECF)  
Justin T. Loughry, Esquire (By email)